

DEPARTMENTS:

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National LP-Gas Association - 1301 West 22nd Street - Oak Brook, Illinois 60521 - 312-573-4800

February 25, 1988 File: Tbpt-631

Mr. Alan I. Roberts, Director Office of Hazardous Materials Regulations Research & Special Projects Administration U.S. Department of Transportation 400 Seventh St. SW Washington, DC 20590

Subject: Seasonal Filling Densities for LP-Gas Cargo Tanks

Dear Mr. Roberts:

NLPGA recommends amendment of Section 173.315(b) of the Hazardous Materials Regulations to provide increased filling limits of liquefied petroleum gas (LP-gas) cargo tanks. Limiting conditions and a revision to Table 173.315(b) are enclosed.

The National LP-Gas Association (NLPGA) is the national trade association of the LP-gas industry with a membership over 4,100, including 47 affiliated state and regional association representing all 50 states. A very significant part of our membership are local LP-gas retail marketers, though our membership also includes common and contract motor carriers of LP-gas. Thus, our members have a very direct and concerned interest for regulations that affect the design and operation of MC-330 and MC-331 cargo tanks.

In support of this proposed amendment, we are enclosing a report of research performed on tank filling densities by the School of Chemical Engineering, Oklahoma State University, Stillwater, Oklahoma. This research was initiated by the National LP-Gas Association with the University in 1969 and after an unavoidable delay was completed in 1978. This data was originally submitted to DOT by NLPGA in a petition for rule making dated October 23, 1978. The petition was subsequently returned by DOT on May 20, 1986 with the request that the proposal be reviewed to determine if it was still valid considering recent changes in technology and regulations.

This letter resubmits a proposed change to the Hazardous Materials Regulations along with this OSU research report. As applied to Commercial and Special Duty Propane (see ASTM D-1835, copy enclosed), the data in this research report indicates the following change can be made with no sacrifice in safety. These changes are reflected in the following proposed addition to the table in Section 173.315(b).

Winter (November through March) filling of cargo tanks:

A filling density of 47.5% of water weight capacity for two ranges of specific gravity "0.496 to 0.503" and "0.504 to 0.510" for over the road cargo tanks, provided (1) these containers are normally emptied within three days of filling and (2) these containers are filled at liquid temperatures below 70 F.

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These changes would contribute materially toward the conservation of energy resources by reducing the number of trips necessary to transport this fuel to the consumer. From a safety standpoint, a reduction in the number of trips would also reduce the overall exposure of tank trucks to the highway environment. The Winter is a peak period for transportation of propane. By permitting trucks to carry more product per trip under the qualifications set out, consumer outages attributed to transportation problems during extreme weather conditions would be minimized. In summary, we feel that adoption of the proposed changes would be beneficial to the consumer, the industry and the government.

LP-gas cargo tanks are of two basic types - bobtails and highway transports. Bobtails are local delivery units; the common capacity of a bobtail is 2,000 to 3,500 gallons water capacity (gwc) with 2,500 gwc being a typical size.

Highway transports are articulated units, commonly called semi-trailers, and are pulled by highway tractors. These vehicles usually have a capacity of 7,500-11,000 gwc, may range several hundred miles or more, and are used primarily for distance bulk transportation of LP-gas between pipeline terminals and local distribution facilities. There is a third type (used mostly on the West Coast) that uses a large, tandem-axle bobtail unit in combination with a second cargo tank mounted as a full trailer. These combination units transport LP-gas in the same general quantities as a highway transport unit, and would have the same economic benefits as a transport with respect to seasonal filling densities.

There are an estimated 6,000 highway transports in the United States transporting. The annual savings in delivery costs would be about \$17,400,000. There are an estimated 18,000 bobtails in the United States in LP-gas service. The approximate annual savings for these vehicles is \$19,350,000. The derivation of these respective savings is enclosed.

In addition to the economic benefit that would be realized with these winter filling densities, there would be a contribution towards improved safety in transportation. Any time that it becomes possible to decrease the number of vehicle movements over the highways, there is a demonstrated improvement in safety. This improvement occurs because the number of possibilities for an incident to occur have been reduced. Thus, the economic benefit provided by the higher winter filling densities would be supplemented by improved safety experience in LP-gas transportation.

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We have heard various concerns expressed for the possible effect of seasonal filling densities upon LP-gas tank trucks in areas such as Puerto Rico, where there are virtually no seasonal temperature changes. Enclosed is a copy of temperature data for San Juan, Puerto Rico covering the period 1898-1947; this data was obtained from the National Oceanic and Atmospheric Administration, National Meteorological Center. The center column shows maximum and minimum temperatures recorded in the particular month. For the 48-year period, the maximum daily temperature in the months November-March was 93 F, well below the 120 F maximum daily temperature recorded for Yuma, Arizona for a 69-year period. Similar data for Yuma provided by NOAA also is enclosed. Thus, there would be no adverse effect upon LP-gas shipments in Puerto Rico using the proposed winter filling densities. Yuma, Arizona is one of the data points included in the research conducted by Oklahoma State University referenced earlier in this letter.

We would be glad to discuss the research data and this petition for rule making at your convenience. Representatives of Oklahoma State University also are available to discuss the more technical aspects of the research work and report.

Sincerely,

W. H. Butterbaugh, CAE Assistant Vice President

Technical Services

Enclosures See Docket File/Sde

Standard Specification for LIQUEFIED PETROLEUM (LP) GASES1

. Standard is issued under the fixed designation D 1835; the number immediately following the designation indicates rear of original adoption or, in the case of revision, the year of last revision. A number in parentheses indicates the r of last reapproval.

Scope

- 1.1 7 /specification covers those prods commonly referred to as liquefied petron gases.
- .2 This specification is applicable to prod-; intended for use as domestic, commer-. industrial, and engine fuels.
- 3 This specification is for use in formulatspecifications for required properties of efied petroleum gases at the time of delivn bulk.

pplicable Documents

| ASTM Standards:

1265 Sampling Liquefied Petroleum (LP) Gases²

267 Test for Vapor Pressure of Liqueied Petroleum (LP) Gases (LP-Gas 1ethod)2

657 Test for Specific Gravity of Light bons by Pressure Hydrometer2 337 Test for Volatility of Liquefied Peolcum (LP) Gases3

338 Test for Copper Strip Corrosion by iquefied Petroleum (LP) Gases3

58 Test for Residues in Liquefied Penleum (LP) Gases³

63 Analysis of Liquefied Petroleum P) Gases and Propylene Concentrates Gas Chromatography3

20 Test for Hydrogen Sulfide in Liqued Petroleum (LP) Gases (Lead Acee Method)3

8 Calculation of Certain Physical perties of Liquefied Petroleum (LP) ses from Compositional Analysis³

3 Test for Dryness of Propane (Valve eze Method)3

1 Test for Sulfur in Liquefied Petro-

leum Gases (Oxy-Hydrogen Burner o Lamp)3

2.2 Other Documents: GPA Publication 21404

3. Types

3.1 Four basic types of liquefied petroleum gases are provided to cover the common use applications, as follows:

3.1.1 Commercial Propane - A hydrocarbon product for use where high volatility required.

3.1.2 Commerical Butane - A hydrocar bon product for use where low volatility required.

3.1.3 Commercial PB Mixtures - Mixtures of propane and butane for use where interme? diate volatility is required.

3.1.4 Special-Duty Propane - A high-qual ity product composed chiefly of propane, which exhibits superior antiknock characteristics when used as an internal combustion engine fuel.

4. Detail Requirements

4.1 The four types of liquefied petroleum gases shall conform to the requirements prescribed in Table 1.

5. Sampling

5.1 Proper sampling of liquefied petroleum a gases is extremely important if the tests are to be significant. All samples shall be obtained in accordance with Method D 1265.

1 This specification is under the jurisdiction of ASTM Committee D-2 on Petroleum Products and Lubricants.

Current edition approved Aug. 27, 1976. Published October 1976. Originally published as D 1835 - 61 T. Last previous edition D 1835 - 75.

**Annual Book of ASTM Standards. Part 23.

³ Annual Book of ASTM Standards, Part 24.

Available from Gas Processors Assn., 1812 First Place, Tulsa, Okla, 74103.

TABLE 1 Detail Requirements for Liquefied Petroleum Gases

		Pr	oduct Designati	ion	_
-	Commercial Propane	Commercial Butane	Commercial PB Mixtures	Special-Duty Propane ⁴	ASTM Test Methods (see Section 2)
sor pressure at 100°F (37.8°C), max, psig	208	70	,	208	D 1267 or
	1430	485		1430	D 2598
interesidue:					
caporated temperature, 95 %, max, °F	-37	36	·36	-37	
	-38.3	2.2	2.2	-38.3	D 1837
°C of				2.6	n 2162
and heavier, max, vol %	2.5		: '.'	2.5	D 2163
-tane and heavier, max, vol %		2.0	2.0		D 2163
Propylene content, max, vol %				5.0	D 2163
edual matter:			0.05	0.06	D 2158
residue on evaporation 100 ml, max, ml	0.05	0.05	0.05	0.05	
oil stain observation	pass ^c	pass ^c	bass c	passc	D 2158
Relative density (specific gravity) at 60	/ D	Ď	D	• • •	D 1657 or
60°F (15.6/15.6°C)		•			D 2598
Corrosion, copper, strip, max	No. 1	No. 1	No. 1	No. 1	D 1838
Sulfur, grains/100 ft ³ max at 60°F and 14.9°	2 15	15	15	10	
psia mg/m³ (15.6°C and 101 kPa)	343	343	343	229	D 2784
Hydrogen sulfide content				pass*	D 2420
	pass			pass	D 2713
Moisture content Free water content		none	noner		

⁴ Equivalent to Propane HD-5 of GPA Publication 2140.

The permissible vapor pressures of products classified as PB mixtures must not exceed 200 psig (1380 kPa) and additionally must not exceed that calculated from the following relationship between the observed vapor pressure and the observed specific gravity:

Vapor pressure, max = 1167 - 1880 (sp gr 60/60°F) or 1167 - 1880 (density at 15°C)

A specific mixture shall be designated by the vapor pressure at 100°F in pounds per square inch gage. To comply with the designation, the vapor pressure of the mixture shall be within +0 to -10 psi of the vapor pressure specified.

^c An acceptable product shall not yield a persistent oil ring when 0.3 ml of solvent residue mixture is added to a filter paper, in 0.1-ml increments and examined in daylight after 2 min as described in Method D 2158.

Although not a specific requirement, the specific gravity must be determined for other purposes and should be reported. Additionally, the specific gravity of PB mixture is needed to establish the permissible maximum vapor pressure (see Footnote b).

An acceptable product shall not show a distinct coloration.

The presence or absence of water shall be determined by visual inspection of the samples on which the gravity is

APPENDIX

XI. SIGNIFICANCE OF ASTM SPECIFICATIONS FOR LIQUEFIED PETROLEUM (LP) GASES

X1.1 General

X1.1.1 Liquefied petroleum gas products are composed of those readily liquefiable hydrocarbon compounds which are produced in the course of Processing natural gas and also in the course of the conventional refining of crude oil. The composition of liquefied gases can vary widely depending upon the source and the nature of the treatment to which the products have been subjected.

X1.1.2 There are many uses for liquefied petroleum gases. Important uses are, (1) as domestic, commercial, and industrial fuels. (2) as a carbon source material in metal treating operations, (3) as refinery raw materials for synthetic gaseline pro-

duction, and (4) as petrochemical raw materials. The nature of the needs dictates the required composition characteristics in these various applications. Since the last three uses of those listed are in the category of specialty applications which involve special requirements, they are excluded from consideration in the specifications.

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X1.1.3 In substance, the ASTM Specifications for Liquefied Petroleum Gases are designed to properly define acceptable products for domestic, commercial, and industrial uses. In many cases it will be found that products meeting the specifications will also be usable in applications other than the ones for which they were designed. The following may be accepted as a general guide in the more on use applications of the three types of

1.3.1 Commercial Propane—This fuel type one preferred for domestic, commercial, and rial use, particularly in geographical areas 1 seasons where low ambient temperatures ommon, and where uniformity of fuel is an tant consideration.

1.3.2 Commercial PB Mixtures-This fuel since it covers a broad range of mixtures, ts the tailoring of fuels to specific needs. The is mixtures find application as domestic, comal, and industrial fuel in areas and at times low ambient temperature conditions are less ently encountered.

.1.3.3 Commercial Butane—This fuel type plication as a domestic fuel in areas limit rmer connates. It is similarly used in industrial ations where problems of fuel vaporization of present.

.1.3.4 Special-Duty Propane — This fuel type secial liquefied petroleum gas product tailored et the restrictive needs of internal combustion es operating under moderate to high engine ity. Fuel products of this type will be less ble in composition and combustion characterthan the other products covered by this speci-

Significance

1.2.1 Since commercial liquefied petroleum are essentially either single component proddepending upon fuel type, it follows that all of aportant behavior characteristics of such prodcan be defined and controlled by a relatively simple measurements. The specification tests h are provided achieve the desired result. The sicance of the various tests as they may apply nsumer problems is summarized here.

1.2.1.1 Vapor Pressure, Volatility, and Grav-

Vapor Pressure is an indirect measof the most extreme low-temperature condiunder which initial vaporization can be exed to take place. It can be considered as a quantitative measure of the amount of the volatile material present in the product. It also be used as a means for predicting the mum pressures which may be experienced at tank temperatures. Vapor pressure becomes : significant when it is related to volatility.

1.2.1.1.2 Volatility, expressed in terms of the evaporated temperature of the product, is a sure of the amount of least volatile fuel compopresent in the product. Coupled with a vapor sure limit, it serves to assure essentially singleponent products in the cases of commercial ane and commercial butane fuel types. When tility is coupled with a vapor pressure limit th has been related to gravity, as in the case of commercial PB-mixture type of fuels, the comtion serves to assure essentially two component ures for such fuels. When coupled with a er vapor pressure limit, this measurement serves to assure that special-duty propane products: will be composed chiefly of propane and propylene

and that propane will be the major constituent.

X1.2.1.1.3 Gravity, by itself, has little significance. It becomes of value only when related to vapor pressure and volatility. Since gravity is of importance in meeting transportation and storage requirements it is always determined for all liquefied petroleum gas products.

X1.2.1.2 Other Product Characteristics -- While the vaporization and combustion characteristics of commercial liquefied gas products are completely defined for the normal use applications by vapor pressure, volatility, and gravity, as given in X1.2.1.1, there are other items which either affect or might affect the results obtained in some specific & use applications. For that reason, limits are specified for residue content, copper corrosion, sulfur content, moisture content, and free water content to provide assurance of product dependability under the more extreme conditions of use.

X1.2.1.2.1 Residue (End Point Index) is a measure of the concentration of combustible hydrocarbon materials present in the product which are substantially less volatile than the liquefied petroleum gas hydrocarbons. Control over residue content is of considerable importance in use applications where the fuel is used in liquid feed systems. In such cases, failure to limit the permissible concentration of residue materials may result in troublesome deposits. It is also of importance where the fuel vapors are withdrawn from the top of the storage container. In such applications, regulating equipment tends to become fouled up if excessive & amounts of residue are present in the field.

X1.2.1.2.2 Copper Corrosion limits are for the purpose of providing assurance that difficulties will not be experienced in the deterioration of the copper and copper-alloy fittings and connections which are commonly used in many types of utilization, storage, and transportation equipment. The further provision that special-duty propane products shall not contain detectable amounts of hydrogen sulfide is an added safeguard included for the same purpose.

X1.2.1.2.3 Sulfur Content limits are provided primarily for the purpose of more completely defining liquefied petroleum gas products since these products are inherently much lower in sulfur content than other petroleum-derived fuels. In the normal fuel use applications for liquefied petroleum & gas, sulfur content is considered to be of limited significance if the other product characteristics are within the specified limits.

X1.2.1.2.4 Moisture Content is a measure of the \$\varphi\$ approximate percentage saturation of the product & with water. This measurement is a requirement sa only on the commercial and special duty propane types of liquefied petroleum gas. The purpose of moisture content control is to provide assurance that pressure reducing regulators and similar equip-ment will operate consistently without troublesome freeze-ups caused by the distillation of dissolved water from the product.



D 1835

X1.2.1.2.5 Free Water Content is of importance only on the commercial PB-mixtures and commercial butane type products. These two types of products are normally used under ambient conditions

which are mild and, as a consequence, the only requirement is vigilance to assure that no free water is present.

The American Society for Testing and Materials takes no position respecting the validity of any patent rights asserted in connection with any item mentioned in this standard. Users of this standard are expressly advised that determination of the validity of any such patent rights, and the risk of infringement of such rights, is entirely their own responsibility.

This standard is subject to revision at any time by the responsible technical committee and must be reviewed every five years and if not revised, either reapproved or withdrawn. Your comments are invited either for revision of this stundard or for additional standards and should be addressed to ASTM Headquarters. Your comments will receive careful consideration at a meeting of the responsible technical committee, which you may attend. If you feel that your comments have not received a fair hearing you should make your views known to the ASTM Committee on Standards, 1916 Race St., Philadelphia, Pa. 19103, which will schedule a further hearing regarding your comments. Failing satisfaction there, you may appeal to the ASTM Board of Directors.

Highway Transports

Increased filling densities would provide immediate cost benefits to the transports that were built to comply with the previous Federal maximum weight limit of 73,280 lbs.; these units are typically 10,520 gallons water capacity (gwc). The present Federal weight limit of 80,000 lbs. would allow a LP-gas transport to be about 11,500 gwc fully loaded. Units designed to the 73,280 lb. limit could add 3,073 lbs. of propane from the increased filling density and still be well under the 80,000 lb. limit. Units designed to the 80,000 lb. limit would not benefit from additional cargo capacity since they are already operating at the maximum permitted weight. In addition, there would be some long range savings in the purchase of new tractors for older trailers which would not require the additional expenditure of weight savings specifications in order to haul maximum gallons.

Based upon a review of various issues of NLPGA LP-Gas Market Facts and other sources, there are approximately 7,000 transports in the United States. An estimated 1,000 of these units were designed and built to take advantage of the 80,000 lb. limit, leaving an estimated 6,000 units that could benefit from additional transportation capacity.

Typical Transport 10,520 gwc Average number of trips (November through March) 200 Average hauling cost per gallon \$0.02

Difference in operating cost for additional transportation capacity is negligible.

Product Weight

Proposed winter filling density (10,520 gal) (8.345 lb/gal) (4.85%) = 42,578 lbs. Current winter filling density (10,520 gal) (8.345 lb/gal) (45%) = 39,505 lbs.

Increased product load

3,073 lbs.

Increased gallons hauled

(3,073 lbs):(4.24 lbs/gal) = 725 gallons propane

Annual savings per unit (725 gal/trip)(200 trips/winter)(\$0.02/gal) = \$2,092/unit

Annual national savings (\$2,900/unit) (6,000 units) = \$17,400,000

Bobtails

It is generally recognized in the industry that the average cost of delivery for a bobtail is about \$0.10 per gallon. As noted below, about 172 gallons additional LP-gas capacity would be realized with the proposed seasonal filling densities. This would permit one additional delivery per trip in most instances. If the increased capacity could be utilized only half of the time, estimated savings during the winter months would be \$0.05 per gallon. This estimated utilization is actually quite conservative since most marketers deliver two truck loads a day during this November-March period.

In the long run, the increased filling densities would also tend to reduce the average size of vehicles required, thus keeping them more maneuverable and contribute towards reduced operating expenses.

The following calculation is based on the estimated savings of \$0.05 per gallon, 25 days per month of deliveries, and one trip per day over the five winter months (November-March). A recent NLPGA survey concluded that there were about 18,000 bobtails in operation in the United States.

Average truck size

2,500 gallons water capacity (gwc)

Average number of trips (November through March) Average savings per additional gallon capacity

125 per truck

\$0.05

Product Gallons

Proposed winter filling density (2,500 gal.)(8.345 lb/gal)(48.5%) = 10,118 lbs. Current winter filling density (2,500 gal.)(8.345 lb/gal)(45%) = 9,388 lbs.

Increased product load

730 lbs.

Increased gallons hauled (730 lbs) + (4.24 lb/gal) = 172 gallons propane

Annual savings per unit

(172 gal/load) (125 loads/winter) (\$0.05/gal) = \$1,075 per unit

Annual national savings

(\$1,075 per unit)(18,000 units) = \$19,350,000

UNITED STATES

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January	67	42	1 77	31	84	22	57	28	0.4	2.2	2		
February	72	46	83	35	92	25	59	27	0.4	2.5	2		
March	79	50	91	39	100	31	58	22	0-3	1.5	ž		
April	86	54	98	44	107	38	56	20	0.1	0.9	i		
May	93	60	104	50	120	39	57	18	<0.1	0.9	<0.5		
June	102	68	113	58	119	50	56	18	<0.1	0.6	<0.5		
July	106	77	113	67	120	61	63	27	0.2	1.4	1		
August	104	77	112	67	119	58	68	32	0.6	4.0	2		
September	100	70	109	57	114	50	66	29	0.4	3.7	. ,		
October	88	58	100	47	108	38	61	26	0.3	2-5			
Vovember	76	49	87	37	96	29	57	26	0.2	1.7	i		
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Period	1		Temp	erature			Relative	humidity	Precipitation			
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February	54	36	74	18	87	-12	78	61	3.8	5.2	9	
March	63	44	80	27	90	11	76	55	4.5	3.4	10	
April	72	53	86	37	94	28	77	54	5-1	9.6	10	
May	79	61	89	48	97	39	80	57	4.9	6.3	10	
June	87	69	95	59	105	51	81	57	3.8	4.4	10	
July .	90	72	98	64	108	58	82	53	3.4	6.2	9	
Mugust	90	71	97	63	110	52	84	53	3-7	4.1	ģ	
September	84	65	94	51	104	37	84	54	3.1	4.7	,	
October	74	54	87	38	93	27	82	55	2.8	6.3	'	
Vovember .	61	43	77	27	84	10	80	59	4.1	5.9	é	
December	52	36	70	19	78	5	80	63	4.1	5.9	9	
ear ·	71	53	90•	10**	110	-12	80	57	48-1	9.6	108	
o. of years	67	67	51	51	67	67	43	13	51	70	51	

Period	1		Temp	erature			Relative	humidity	Precipitation				
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_	i		degrees F			per cent.		inc					
Jenuary	53	41	64	31	77	20	86	78	7.1	5.1	17		
February	53	41	63	32	85	24	ē7	78	6-5	4.9	15		
Nerch	54	43	65	34	78	29	87	76	5.2	3.9	16		
April	56	44	66	37	79	31	87	76	3.3	2.9	12		
May	57	47	56	41	84	35	84	77	1.8	2.2			
Tune	59	50	67	44	85	40	90	77	0.7	2.0	9		
July	60	51	66	47	76	43	91	79	0.1	1.2	5		
August	60	52	67	48	79	44	92	81	0.2	2.6	2		
September	61	51	70	44	85	36	91	80	1.0	2.8			
October	60	48	73	40	84	34	90	80	2.3		5		
November	57	45	69	36	81	27	88	80	5.2	3.6	9		
December	54	42	64	33	70	22	86	79	5· 2	4.5	12 16		
Year	57	46	76*	29**	85	20	89	78	39.7	5.1	120		
No. of years	60	60	58	58	60	60	57	57	67	63	58		

^{*} Average of highest each year



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January	66	38	75								
February	72	44	85								
March	81	51	93								
April	90	60	105								
May	99	69	112								
June	109	78	119								
July	116	87	122								
August	114	84	121								
September	106	73	118								
October	91	59	106								
November	76	46	90								
December	66	39	77								
Year	91	51	123*								
No. of years	37	37	10								

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January	54	38	68
February	61	42	74
March	66	44	81
April	74	48	88
May	81	53	96
Tune	91	59	105
Tuly	99	65	108
August	97	63	105
September	89	58	100
October	78	51	91
November	66	43	79
December	55	38	68
Year	76	50	109•
No. of years	43	43	20

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Jenuary	65	45	79
February	66	47	80
Merch	65	48	83
April	70	50	86
May	72	53	87
June ·	76	56	90
July	81	60	91
August	82	60	94
September	81	58	96
October	76	54	92
November	73	50	87
December	67	47	81
Year	73	52	100*
No. of years	70	70	53

^{*} Average of highest each year

^{**} Average of lowest each year

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